S W R C B

California Regional Water Quality Control Board

San Francisco Bay Region

Internet Address: http://www.swrcb.ca.gov
1515 Clay Street, Suite 1400, Oakland, California 94612
Phone (510) 622-2300 • FAX (510) 622-2460

Winston H. Hickox
Secretary for Environmental Protection

Gray Davis
Governor

P.O. PROTECTION
99 MAR 26 AM 9:26

FA

March 18, 1999
File No. 2199.9251 (DCL)

Don Didio
Industrial Asphalt
P.O. Box 636
Pleasanton, CA 94566

Subject: No Further Action - Industrial Asphalt and CalMat, 52 El Charro Road, Pleasanton, Alameda County

Dear Mr. Didio:

This letter confirms the completion of site investigation and remedial action for the pollutant releases at the subject site. Enclosed are the case closure summaries.

Board staff have reviewed your December 7, 1998, *Semi-Annual Groundwater Monitoring Report and Request for Site Closure*, submitted by Kleinfelder. The results indicated that TPH-d and TPH-mo, the primary pollutants, have remained relatively stable or continued to decrease after the cessation of the groundwater extraction and treatment system, and the addition of ORC in 1996. The maximum remaining concentrations are 2.9 and 1.5 ppm for TPH-d and TPH-mo, respectively. PCBs were not detected at or above laboratory reporting limits. Moreover, your March 15, 1999, *Results of Sampling for MTBE* showed that no MTBE is present on-site.

Based upon the available information, including the current land use, and with the provision that the information provided to this agency was accurate and representative of site conditions, no further action related to the pollutant release at the subject site is required. If a change in land use is proposed, the owner must promptly notify this agency.

The groundwater monitoring wells shall be appropriately closed after obtaining the necessary permits. A monitoring well closure report shall be submitted to this agency within 60 days from the date of this letter.

Please contact Derek Lee of my staff at (510) 622-2374 if you have any questions.

Sincerely,

Loretta K. Barsamian
Executive Officer

Stephen I. Morse, Chief
Toxics Cleanup Division

Enclosure: Site Closure Summary
cc w/o enc: Steven Walker
Kleinfelder
7133 Koll Center Parkway, Suite 100
Pleasanton, CA 94566-3101

Craig Mayfield
Water Resources Engineer III
Zone 7 Water Agency
5997 Parkside Drive
Pleasanton, CA 94588

~~Don Atkinson~~-Adams
Hazardous Materials Program
ACDEH
1131 Harbor Bay Parkway, 2nd Floor
Alameda, CA 94502-6577

Cal/EPA

San Francisco
Bay Regional
Water Quality
Control Board

1515 Clay Street
#1400
Oakland, CA 94612
(510) 622-2300
FAX (510) 622-2460

ENVIRONMENTAL PROTECTION
99 JAN 13 PM 2:59

Gray Davis
Governor

Date: JAN 12 1999
File No. 2199.9251 (DCL)

Don Didio
Industrial Asphalt
P.O. Box 636
Pleasanton, CA 94566

Subject: Recission of Waste Discharge Requirements (Board Order No. 93-037) - Industrial Asphalt and CalMat, 52 El Charro Road, Pleasanton, Alameda County

Dear Mr. Didio:

Enclosed is a copy of a tentative order for the rescission of Board Order No. 93-037. This matter is scheduled to be considered in the Board meeting of February 17, 1999, but may be rescheduled to a later date to assure a quorum of Board members. You will be notified of any change in meeting date. The meeting will be held in the Auditorium of the Elihu Harris State Building at 1515 Clay Street, Oakland. The meeting starts at 9:30 am. Please submit any comments you have no later than 5 p.m. on January 27, 1999.

Please contact Derek Lee of my staff at (510) 622-2374 if you have any questions.

Sincerely,

Loretta K. Barsamian
Executive Officer

Stephen I. Morse, Chief
Toxics Cleanup Division

Enclosure: Tentative Order
cc w/ enc: Mailing List

MAILING LIST

Carig Mayfield
Zone 7 Water Agency
5997 Parkside Drive
Pleasanton, CA 94588

Steven Walker
Kleinfelder
7133 Koll Center Parkway, Suite 100
Pleasanton, CA 94566-3101

Don Atkinson-Adams
Hazardous Materials Program
ACDEH
1131 Harbor Bay Parkway, 2nd Floor
Alameda, CA 94502-6577

Danielle Stefani
Livermore-Pleasanton Fire Department
4550 East Avenue
Livermore, CA 94550

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION

TENTATIVE ORDER
RESCISSION OF ORDER NUMBER 93-037, WASTE DISCHARGE REQUIREMENTS
INDUSTRIAL ASPHALT AND CALMAT, ALAMEDA COUNTY

The California Regional Water Quality Control Board, San Francisco Bay Region (hereinafter Board) finds that:

1. On April 21, 1993, the Board issued Waste Discharge Requirements (WDR) for discharge/reinfiltration of treated extracted groundwater to Industrial Asphalt (IA) and CalMat (CM) for their property at 52 El Charro Road, Pleasanton, Alameda County (Order No. 93-037).

2. IA, a division of CM, has occupied the site since 1963. Six underground storage tanks (USTs) were used for storing asphalt, and two were for storing diesel fuel. During the USTs removal in 1987, free product was discovered and recovered from the bottom of the UST cavity and disposed of off-site. Subsequent subsurface investigations revealed that the groundwater contained maximum concentrations of 1100 ppm, 330 ppm, 360 ppm, and 0.062 ppm, for TPH-d, TPH as motor oil, oil and grease, and PCBs, respectively. The WDR was issued for discharge of the treated groundwater to a holding pond from a pump and treat system consisting of eleven extraction wells.

3. The groundwater extraction and treatment system was operated from July 1994 to July 1996. Socks containing oxygen releasing compounds were then installed in seven inactive extraction wells to address the residual contaminants in the groundwater. Concentrations of TPH-d and TPH-mo have decreased to less than 3 ppm and have remained stable or continued to decrease after the cessation of pumping and the addition of oxygen-releasing compounds. The WDR is therefore no longer needed.

4. The rescission of WDR for the discharge is exempt from the provisions of the California Environmental Quality Act (CEQA) pursuant to Section 15304 of the Resources Agency Guidelines.

5. The Board has notified the dischargers and interested agencies and persons of its intent to rescind WDR for the discharge, and has provided them with an opportunity for a public hearing and an opportunity to submit their written views and recommendations.

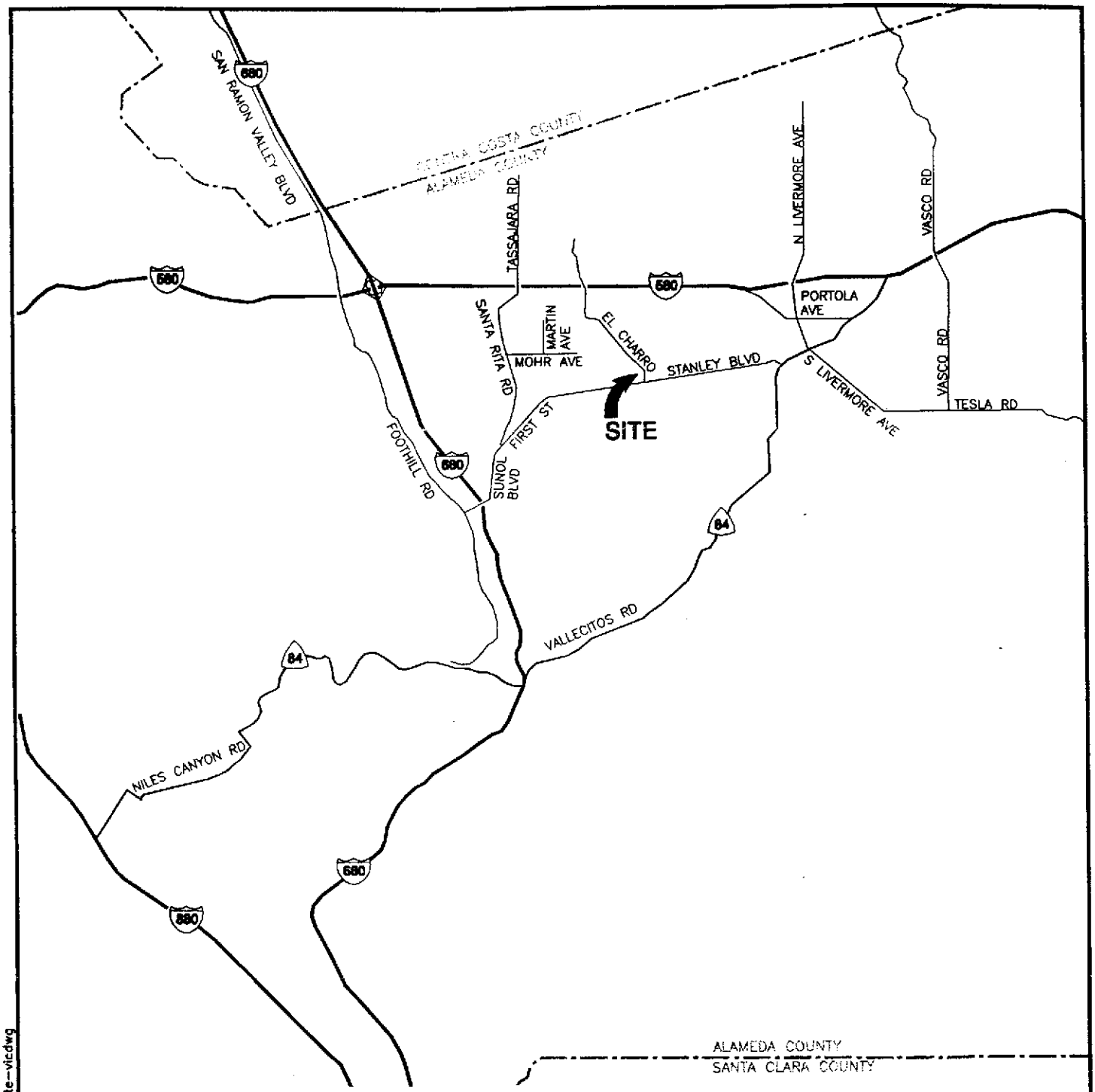
6. The Board, in a public meeting, heard and considered all comments pertaining to the discharge.

IT IS HEREBY ORDERED that Board Order Number 93-037 is rescinded.

I, Loretta Barsamian, Executive Officer, do hereby certify the foregoing is a full, true, and correct copy of an Order adopted by the California Regional Water Quality Control Board, San Francisco Bay Region, on February 17, 1999.

_____

Loretta K. Barsamian
Executive Officer



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CAD FILE: C:_KA-PROJ\PLEAS\10168209\804\site-vicdwg

KLEINFELDER

DRAFTED BY: L. Sue	DATE: 11-24-98
CHECKED BY: S. Walker	DATE: 11-24-98

SITE VICINITY MAP

INDUSTRIAL ASPHALT
52 EL CHARRO ROAD
PLEASANTON, CALIFORNIA

PROJECT NO. 10-1682-804

PLATE 1

KLEINFELDER

August 25, 1992
File: 10-1682-08/103

Mr. Lester Feldman
Regional Water Quality Control Board
2101 Webster Street, Suite 500
Oakland, CA 94612

SUBJECT: Regulatory Requirements for Treated Ground Water at Industrial Asphalt, Pleasanton, California

Dear Mr. Feldman:

On August 19, 1992, the Regional Water Quality Control Board (RWQCB), Industrial Asphalt and Kleinfelder met to clarify the steps that will be taken to permit discharge of treated ground water from the Industrial Asphalt site located at 52 El Charro Road in Pleasanton, California. Based on discussions during the meeting, we have developed the following understanding:

- Discharge of treated ground water to Jamieson percolation ponds may occur upon receipt of a Waste Discharge Requirements (WDR) permit. This permitting approach would follow the precedence set by the WDR permitting used to permit the CAMSI IV site in Santa Clara, California. Kleinfelder will prepare and submit a Report of Waste Discharge application and a draft WDR permit for review and modification by RWQCB.

- Treated ground water to be discharged is not a "toxic waste" but a "designated waste" appropriately classified as a non-Chapter 15 IIb discharge with an annual permitting fee of $1,200.

- The Alameda County Public Health Department will continue to be the Lead Enforcement Agency under authorization from RWQCB. The Public Health Department has approved the Feasibility Study in principle and to the extent that new feasibility study activities will not be required capriciously.

We appreciate the time taken from your busy schedules to meet with us and to develop this understanding of regulatory requirements. Kleinfelder is proceeding expeditiously with development of the remediation system design and construction. If you have questions or need more information, please do not hesitate to call.

Sincerely,

KLEINFELDER, INC.

David K. Behrens, P.E.
Senior Project Manager

cc: Mr. Dennis Hunt
Mr. Dwight Beavers
[redacted]
Mr. John Jang

(77)10-1682-08/103-(C92264)

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white -env.health
yellow -facility
pink -files

ALAMEDA COUNTY, DEPARTMENT OF ENVIRONMENTAL HEALTH

80 Swan Way, #200
Oakland, CA 94621
(415) 271-4320

Hazardous Materials Division Inspection Form

I

Site ID# _____ Site Name Industrial Asphalt Today's Date 4/15/92

Site Address 52 El Charro Rd. EPA ID# _____

City Pleasanton Zip 94566 Phone _____

MAX Amt. Stored > 500lbs/55g/200cf? Y N
Hazardous Waste generated per month? _____

Inspection Categories:
___ I. Haz. Mat/Waste GENERATOR/TRANSPORTER
___ II. Business Plans, Acute Hazardous Materials
___ III. Underground Tanks

The marked items represent violations of the Calif. Administration Code (CAC) or the Health & Safety Code (HS&C)

I.A GENERATOR (Title 22)

	___ 1. Waste ID	* 66471
	___ 2. EPA ID	66472
	___ 3. > 90 days	66508
	___ 4. Label dates	66508
	___ 5. Biennial	66493
Manifest	___ 6. Records	66492
	___ 7. Correct	66484
	___ 8. Copy sent	66492
	___ 9. Exception	66484
	___ 10. Copies Rec'd	66492
Misc.	___ 11. Treatment	66371
	___ 12. On-site Disp. (H.S.&C.)	26189.5
	___ 13. Ex Haz. Waste	66570
Prevention	___ 14. Communications	67121
	___ 15. Aisle Space	67124
	___ 16. Local Authority	67126
	___ 17. Maintenance	67120
	___ 18. Training	67105
Contin. gency	___ 19. Prepared	67140
	___ 20. Name List	67141
	___ 21. Copies	67141
	___ 22. Emg. Coord. Trng.	67144
Containers, Tanks	___ 23. Condition	67241
	___ 24. Compatibility	67242
	___ 25. Maintenance	67243
	___ 26. Inspection	67244
	___ 27. Buffer Zone	67246
	___ 28. Tank Inspection	67259
	___ 29. Containment	67245
	___ 30. Safe Storage	67261
	___ 31. Freeboard	67257

I.B TRANSPORTER (Title 22)

	___ 32. Applic./Insurance	66428
	___ 33. Comp. Cert./CHP Insp.	66448
	___ 34. Containers	66465
Manifest	___ 35. Vehicles	66465
	___ 36. EPA ID #s	66531
	___ 37. Correct	66541
	___ 38. HW Delivery	66543
	___ 39. Records	66544
Cont'rs	___ 40. Name/ Covers	66545
	___ 41. Recyclables	66800

Comments:

The deposit Refund is currently at a low minimum. Please deposit 1500.00 to the Alameda County to enable us to continue to work on this case.

I

Rev 6/88

Contact: _____

Title: _____

Signature: _____

Inspector: Ravi Arulanantham

Signature: _____

KLEINFELDER

transmittal

Date 1/13/92

File 10-1658-08

Copies file

To Mr. Robi Arulanantham
Alameda Co. Dept, Environmental Health Haz Mat Prog.
80 Swan Way, Room 200
Oakland, CA 94621

Subject Industrial Asphalt, Pleasanton

We are sending ☒ Attached ☐ Under separate cover

The following: Our schedule for site remediation. Start date is January 13, 1992

Via:

- ☐ Messenger
- ☒ First Class Mail
- ☐ Air
- ☐ Express
- ☐ United Parcel
- ☐ Air Freight
- ☐ _____

Transmitted:

- ☒ As Requested
- ☐ For Approval
- ☐ For Your Use
- ☐ For Review & Comment

Remarks If you have any questions concerning remedial activities, please call either David Behrens or Krys Jasionek.

By Guy A Jett

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

RAFAT A. SHAHID, Assistant Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Division
80 Swan Way, Rm. 200
Oakland, CA 94621
(510) 271-4320

December, 18 1991

Mr. Dennis Hunt
District Manager
Industrial Asphalt
52 El Charro Road
Pleasanton, CA 94566

RE: FEASIBILITY STUDY REPORT (FSR)
INDUSTRIAL ASPHALT, 52 EL CHARRO ROAD, PLEASANTON, CALIFORNIA

Dear Mr. Hunt:

This letter is to confirm the agreements we reached during the 9/19/91 meeting held in this office. This office and the RWQCB concurs "in principle" with the recommendations presented in the FSR. However, as remediation progresses further revisions to the FSR may be required by any of the regulatory agencies involved.

Since the FSR recommends "no action" for soil remediation, this office will certainly want to see an aggressive groundwater remediation program designed and implemented without any further delay. A groundwater remediation program including a detailed time table of all proposed activities must be submitted to this office and the RWQCB as soon as possible.

The issue of leachability of both the petroleum hydrocarbons and PCBs from soil to groundwater in the long run is an important concern to this office. Therefore, during the course of groundwater remediation and depending on its' effectiveness in removing the contaminants a through study should be carried out to evaluate and the potential threat to groundwater resources at this site. Should you have any questions concerning this matter, please contact me at 510/271-4320.

Sincerely,

Ravi Arulanantham
Hazardous Materials Specialist

c; Lester Feldman, RWQCB
Mark Thomson, Deputy District Attorney
David Behrens, Kleinfelder
Files

KLEINFELDER

91 MAR 21 PM 12: 03

March 19, 1991
File 10-1682-03/32

Mr. Gilbert Wistar
Hazardous Materials Specialist
Department of Environmental Health
Hazardous Materials Program
Alameda County Health Care Services Agency
80 Swan Way, Room 200
Oakland, California 94621

SUBJECT: Alameda County Department of Environmental Health Response to Remedial Investigation/Baseline Health Risk Assessment for the Industrial Asphalt Facility, 52 El Charro Road, Pleasanton, California

Dear Mr. Wistar:

This letter was written by Kleinfelder, Inc., on behalf of Industrial Asphalt, to address the response by the Alameda County Department of Environmental Health (ACDEH) to the above referenced Remedial Investigation/Baseline Health Risk Assessment (RI/BHRA) report (Kleinfelder, 1991). The response was directed to Mr. Dennis Hunt of Industrial Asphalt in a letter dated 21 February 1991, from Mr. Gilbert Wistar of ACDEH. That response, and the RI/BHRA report, should be referenced in reading this letter.

The response by ACDEH addresses the preparation of a plan for ground water cleanup. However, in light of the requests in the ACDEH response and recent telephone conversations with staff of ACDEH and the State of California Regional Water Quality Control Board (CRWQCB), we believe that it is in the best interests of all concerned parties that some general issues be brought forth prior to setting specific requirements for cleanup and cleanup goals:

1. Industrial Asphalt currently operates the El Charro facility under a longterm property lease from the Jamieson Company (Jamieson), 501 El Charro Road, Pleasanton. The facility is in an unincorporated area of Alameda County and is zoned A, which designates a maximum population density of one residence per 100 acres. Conversations with staff of the Alameda County Planning Department concerning the land in the vicinity of the Industrial Asphalt site indicate that there are no future plans to be incorporated by the Cities of Pleasanton or Livermore, and there are no County plans to change the zoning designation. Areas of significant residential population nearest the Industrial Asphalt site are approximately one mile east in the City of Livermore and one and a half miles west in the City of Pleasanton.

2. We understand the concern that hydrocarbons are present in the unsaturated soil matrix above the level of ground water in the vicinity of the former underground storage tank farm; this soil zone could conceivably act as a secondary source of chemicals leaching into ground water during periods of high ground water levels.

KLEINFELDER 2121 N. California Blvd., Suite 570, Walnut Creek, CA 94596 (415) 938-5610

The following points should be noted regarding subsurface conditions (soil and ground water) at the Industrial Asphalt site and soil as a secondary source:

- Data collected during the RI indicates that for much of the site, the zone of affected soil is at 50 feet to 80 feet below grade. The level of ground water is approximately at 90 feet below grade.

- Free product has been removed from various monitoring wells and approximately 550 cubic yards of affected soil have been excavated during subsequent onsite activities (Kleinfelder, 1990 and 1991).

- During four years of subsurface investigation at the Industrial Asphalt site, the highest water levels in well MW-2 and other monitoring wells were observed in September of 1989. During this sampling event, only a sheen of fuel was noticed on the surface of a bailed aliquot of ground water retrieved from MW-2.

- In four years of subsurface investigation, polychlorinated biphenyls (PCBs) have been intermittently detected in samples of ground water collected from the following monitoring wells: MW-1, MW-2, MW-3, and MW-8. Ground water gradients and flow directions have varied at this site. The fact that PCBs have not migrated to other monitoring wells corroborates the widely held contention that PCBs are relatively immobile in the subsurface. This fact was addressed and demonstrated in modeling environmental fate and transport in Section 10.4.3.3 of the RI/BHRA report (Kleinfelder, 1990).

- Industrial Asphalt performs quarterly monitoring of ground water at the site followed by quarterly reporting of the data.

We would like to meet with staff of ACDEH and CRWQCB to discuss the findings in the RI/BHRA and to outline an approach for a feasibility study for mitigating the subsurface conditions at the Industrial Asphalt facility. However, prior to a meeting, and in light of recent telephone conversations with staff of ACDEH and CRWQCB, we feel that it is appropriate to address issues raised in the ACDEH response to the RI/BHRA. The following paragraphs address some specific statements in the ACDEH response letter:

1. ACDEH cites "below MCLs (Maximum Contaminant Levels) and below levels that could result in a one-in-a-million cancer risk" as goals for ground water cleanup. There are currently no MCLs established by the State of California Department of Health Services (DHS) or the United States Environmental Protection Agency (EPA) for diesel fuel, its major constituents, or PCBs, which are the substances of concern at the Industrial Asphalt site. An MCL has been proposed by EPA for PCBs at 0.5 parts per billion (ppb). Further, there are currently no "cancer risk" numbers available for diesel fuel or its major constituents from either EPA or DHS. EPA has established an oral slope factor for cancer risk of PCBs at 7.7 mg/kg-day by EPA (see RI/BHRA for a discussion of slope factors). EPA has also listed a drinking water concentration of PCBs at 5 x 10-3 ug/l for a specified cancer risk of one-in-a-million.

   We understand that MCLs are set by DHS or EPA as standards for drinking water by public water suppliers. EPA recommends that MCLs are generally not

appropriate as cleanup goals at sites where a supply well would not be placed and ground water would thus not be consumed (EPA, 1988).

We understand further that ground water at the Industrial Asphalt site is part of the Livermore Valley ground water basin as specified in the San Francisco Bay Basin Water Quality Control Plan (CRWQCB, 1986). CRWQCB has designated this water for use as domestic or municipal supply, industrial process supply, industrial service supply, and agricultural supply. In defining municipal and domestic supply, the most critical use designation, CRWQCB allows that "economic impacts associated with treatment or quality-related damages" are a principal issue, and that "the cost (of improving public acceptance of ground water by treatment) may not be economically justified when alternative water supply sources of suitable quality are available" (Ibid).

CRWQCB further allows that in setting discharge requirements to protect beneficial uses, water quality objectives should be "intended to govern the concentration of pollutant constituents in the main water mass. Zones of initial dilution within which higher concentrations can be tolerated will be allowed" (Ibid).

2. The field measurement of fourteen feet of free product in monitoring well MW-2 in August of 1987 appears erroneous in that: other wells closer to the original tank farm did not show this gross amount during the same sampling event; the hydrogeology of the site makes it highly unlikely that free product would accumulate in one specific area or monitoring well; and, the field technician most likely assumed the amount of free product solely based on visual observations of discolored liquid on a weighted tape or rope which was dropped to the bottom of the well.

3. Kleinfelder stands by the findings, conclusions and recommendations in the Baseline Health Risk Assessment (BHRA), i.e., that a de minimus risk to human health and the environment exists from chemicals present in the subsurface at the Industrial Asphalt site. In performing the BHRA, we used guidance from EPA and DHS (EPA, 1989 and DHS, 1986). The overall emphasis of that guidance is to use site-specific data wherever possible in assessing hazard identification, exposure pathways, exposure points, and reasonable maximum exposures (RMEs). For the BHRA for the Industrial Asphalt site, worst-case conservative assumptions were made when actual site data were not available in order to overestimate risks. Some of those worst-case assumptions are restated here for emphasis:

   - Benzene and naphthalene were present in the original diesel spill. This is a worst-case assumption in that benzene and naphthalene, two substances with known toxicological and migratory properties, have not been detected in the subsurface at the Industrial Asphalt site.

   - The transport model assumed an instantaneous spill fully penetrating the water bearing zone. This is a worst-case assumption in that the likely source of diesel was a leaking pipe connection which would have resulted in a slow release into the subsurface and hence would have been subject to dilution by dispersion in the soil matrix (see Section 10.3.4a of the RI/BHRA report for more on dispersion).

- An individual would be exposed to benzene and naphthalene as a result of drinking water from a well at the Jamieson property downgradient of the Industrial site for a seventy-year exposure period. This is a worst-case assumption for reasons mentioned above and in that no individual is likely to experience daily exposure for seventy years.

- The amount of diesel fuel released into the subsurface at the Industrial Asphalt site was estimated to be approximately 20 cubic meters (approximately 21,000 kilograms). This is a worst-case estimate in that the amount was based on the estimated mass of chemicals present in soil and ground water at the site. Estimates were calculated based on analytical results of sampling events performed in the RI. Isocontours of concentration gradients in soil and ground water were drawn based on worst-case assumptions: if a sample of soil or water collected from boring or monitoring well showed nondetectable (ND) concentrations, but the location of the boring or well fell within an area surrounded by borings or wells where collected samples had shown detectable concentrations, the ND location was ignored.

LIMITATIONS

This report was prepared in general accordance with the accepted standard of practice which exists in Northern California at the time the investigation was performed. It should be recognized that definition and evaluation of environmental conditions is a difficult and inexact art. Judgements leading to conclusions and recommendations are generally made with an incomplete knowledge of the conditions present. More extensive studies, including additional environmental investigations, can tend to reduce the inherent uncertainties associated with such studies. If the Client wishes to reduce the uncertainty beyond the level associated with this study, Kleinfelder should be notified for additional consultation.

Our firm has prepared this report for the Client's exclusive use for this particular project and in accordance with generally accepted engineering practices within the area at the time of our investigation. No other representations, expressed or implied, and no warranty or guarantee is included or intended.

We look forward to meeting with you so that an approach for mitigating the subsurface conditions at the Industrial Asphalt facility can be fully addressed.

Sincerely,

KLEINFELDER, INC.

Robert A. Lindfors
Project Engineer

Krzysztof (Krys) S. Jesionek
Project Manager

Thomas Lindemuth, P.E.
Senior Engineer

cc: Dennis Hunt - Industrial Asphalt
Dwight Beavers - Industrial Asphalt
Jack James - Industrial Asphalt
Rico Duazo - California Regional Water Quality Control Board
Jerry Killingstad - Alameda County Flood Control and Water Conservation District - Zone 7

REFERENCES

California Department of Health Services, 1986. California Site Mitigation Decision Tree. Toxic Substances Control Division. May 1986.

U.S. Environmental Protection Agency, 1988. CERCLA Compliance With Other Laws Manual. EPA/540/G-89/006. Office of Emergency and Remedial Response, Washington D.C. August 1988.

U.S. Environmental Protection Agency, 1989. Risk Assessment Guidance for Superfund Sites, Volume 1: Human Health Evaluation Manual (Part A). Office of Emergency and Remedial Response, U.S. EPA, Washington D.C., EPA/540/1-89/002. December 1989.

U.S. Environmental Protection Agency, 1991. Integrated Risk Information System (IRIS) data base. February, 1991.

Kleinfelder, 1990. Remedial Investigation Report, Industrial Asphalt, Pleasanton, California. 28 December 1990.

Kleinfelder, Inc., 1991. Quarterly Report (November 1990 - January 1991), Industrial Asphalt, Pleasanton, California. 5 March 1991.

California Regional Water Quality Control Board - San Francisco Bay Region, 1986. Water Quality Control Plan, San Francisco Bay Basin, Region 2 (including amendments). 1986 and thereafter.

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

February 21, 1991

Mr. Dennis Hunt
Industrial Asphalt
52 El Charro Rd.
Pleasanton, CA 94566

Dear Mr. Hunt:

Thank you for submitting the Remedial Investigation Report/Baseline Health Risk Assessment document prepared for the site by Kleinfelder, Inc. We have reviewed this document and its conclusions in consultation with the Regional Water Quality Control Board in Oakland, and the following is our formal response.

The document concludes that from a health risk standpoint, no further remedial action is warranted; this is based on the nearest downgradient water supply well being the Jamieson well, about 900 feet northeast of the former underground tank area. However, water directly beneath the Industrial Asphalt site is considered "waters of the state" within an aquifer used for water supply, and as such must be restored to drinking water standards. In addition, the Water Board requires the use of recorded worst-case groundwater degradation data as a basis for plume and concentration modeling, rather than existing contaminant levels. As you may recall, up to 14 feet of free product was recorded in one monitoring well in 1987.

Therefore, we are requiring that Industrial Asphalt prepare a plan for groundwater cleanup to below MCLs and below levels that could result in a $1 * 10^{-6}$ cancer risk. This will also require a plan for soil remediation at depth. Groundwater monitoring needs to continue as planned, with all wells tested also for BTEX, PCB, oil & grease (method 5520 C & F), and chlorinated hydrocarbons.

I have discussed these general requirements with Krys Jesionek at Kleinfelder. If you have any questions about this letter, please contact the undersigned at 271-4320.

Sincerely,

Gilbert M. Wistar

Gil Wistar
Hazardous Materials Specialist

cc: Krys Jesionek, Kleinfelder, Inc. (2121 North California Blvd., Walnut Creek, CA 94596)
Lester Feldman, RWQCB
Rafat A. Shahid, Asst. Agency Director, Environmental Health
files

KLEINFELDER

91 JAN 29 AM 11:26

29 January 1991
File: 10-1682-06

Mr. Gilbert Wistar
Alameda County Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

SUBJECT: Corrected Plates 5, 6 and 14, Remedial Investigation Report, Industrial Asphalt, Pleasanton, California

Dear Mr. Wistar:

Attached are three corrected plates number 5, 6 and 14 which should replace appropriate plates in our Remedial Investigation Report, Industrial Asphalt, dated 28 December 1990.

We appology for any inconveniance this may have created. Please call the undersigned with any questions or if you require additional information.

Sincerely,

KLEINFELDER, INC.

(inserted)

Krzysztof (Krys) S. Jesionek
Project Manager

cc: Dennis Hunt - Industrial Asphalt
Dwight Beavers - Industrial Asphalt
Rico Duazo - California Regional Water Quality Control Board
Jerry Killingstad - Alameda County Water District, Zone 7

attachement: Plates 5, 6 and 14
KSJ

KLEINFELDER

91 JAN 22 PM 12:55

28 December 1990
File: 10-1682-06/69

Mr. Gilbert Wistar
Alameda County Department of Environmental Health
Hazardous Materials Division
80 Swan Way, Room 200
Oakland, CA 94621

SUBJECT: Remedial Investigation Report, Industrial Asphalt, Pleasanton, California

Dear Mr. Wistar:

Kleinfelder, Inc., on behalf on Industrial Asphalt, submits the attached Remedial Investigation (RI) Report for their site at 52 El Charro Road in Pleasanton, California.

The RI report describes the field investigation, analyses of collected data and conclusions and recommendations. The investigation followed the Remedial Investigation Work Plan/Remedial Action Plan prepared and submitted by Kleinfelder, dated 15 January 1990, and approved by your organization 9 February 1990.

This RI report is also a 1990 Annual Report as it includes an analysis of monitoring data collected in 1990.

If you have any questions or require additional information, please call the undersigned.

Sincerely,

KLEINFELDER, INC.

Krzysztof (Krys) S. Jesionek
Project Manager

Lloyd C. Venburg, R.G.
Project Supervisor

cc: Dennis Hunt - Industrial Asphalt
Dwight Beavers - Industrial Asphalt
Rico Duazo - California Regional Water Quality Control Board
Jerry Killingsted - Alameda County Water District, Zone 7

KSJ:LCV:cd

STATE OF CALIFORNIA

GEORGE DEUKMEJIAN, Governor

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD
SAN FRANCISCO BAY REGION
1800 HARRISON STREET, SUITE 700
OAKLAND, CA 94612

Phone: Area Code 415
464-1255

MAY 22 1990

Date:
File No.: 2198.15 (RAD)

Mr. Krzysztof Jesionek
Kleinfelder
2121 N. California Blvd., Suite 570
Walnut Creek, CA 94596

SUBJECT: Industrial Asphalt, Monitoring Well Purge Water
Waiver of Waste Discharge Requirements

Dear Mr. Jesionek:

My staff has reviewed your proposal to dispose of some monitoring well purge water onto the ground. I understand that up to 240 gallons of purge water will be disposed of each month. Purge water is retained in 55 gallons drums and left onsite pending the results of laboratory testing.

Water samples are tested for total petroleum hydrocarbons (TPH) as diesel/waste oil and for polychlorinated biphenyls (PCBs). Purge water which, based on analytical testing, contains TPH or PCBs below laboratory testing limits are to be disposed of on the ground. Purge water which contains detectable quantities of TPH or PCBs are utilized in the asphalt manufacturing process at the site.

The water quality concerns of your monitoring well purge water are considered insignificant, considering the small amount to be disposed of each month and the lack of detectable TPH or PCB constituents. Therefore, it is my intent to waive waste discharge requirements for purge water disposal on the ground. This waiver is contingent upon the following:

1. Only purge water which contains non-detectable quantities of TPH or PCBs can be disposed of on the ground. The number of gallons of water disposed of shall be included in your monthly monitoring reports.

2. This waiver is valid only until a ground water treatment system for the site is in operation. Purge water must then pass through the treatment system or be used in the asphalt manufacturing process.

Please respond in writing if you agree to these conditions. You may contact Rico Duazo at (415) 464-0837 if you have any questions.

Sincerely,

Steven R. Ritchie
Executive Officer

90 MAY 25 PM 12:28

cc: Dennis Hunt, Industrial Asphalt
Gil Wistar, Alameda County Environmental Health
Jerry Killingstad, Zone 7

KLEINFELDER

May 1, 1990
File: 10-182-03/32

Mr. Rico Duazo
California Regional Water Quality Control Board
1800 Harrison Street, Suite 700
Oakland, CA 94612

Subject: Waiver for Disposal of Purge Water on Ground, Industrial Asphalt, Pleasanton, California

Dear Mr. Duazo:

Kleinfelder, Inc., purges and samples several existing monitoring wells at the Industrial Asphalt facility, 52 El Charro Road, Pleasanton, California, on a monthly basis. Purge water is retained in 55 gallons drums and left ousite pending outcome of laboratory chemical testing. Approximately 40 gallons of water is purged from each well prior to sampling. Although there are eleven monitoring wells at the site, only six to seven wells are regularly sampled. The other wells remain dry. Therefore, approximately 240 gallons of water is purged from the monitoring wells. All water samples are tested for target compounds including total petroleum hydrocarbons as diesel/waste oil and polychlorinated biphenyls (PCBs).

Purge water containing TPH as diesel/waste oil at or above laboratory detection limits and/or containing PCBs at concentration up to 5 mg/l is utilized in the manufacture of asphalt at the facility. However, purge water from monitoring wells which, based on analytical testing, contains TPH as diesel/waste oil or PCBs below laboratory detection limits, is to be disposed on the ground.

As we discussed during our telephone conversation on April 5, 1990, Kleinfelder, Inc., on behalf of Industrial Asphalt requests a waiver for disposal of this purge water on the ground. The average depth to ground water beneath the site is about 90 feet.

If you have any questions regarding this matter or require additional information, please call the undersigned.

Sincerely,

KLEINFELDER, INC.

Krzysztof (Krys) S. Jesionek,
Project Manager

cc: Dennis Hunt - Industrial Asphalt
Dwight Beavers - Industrial Asphalt
Jack James - Industrial Asphalt
Gil Wistar - Alameda County Department of Environmental Services
Jerry Killingstad - Alameda County Flood Control and Water Conservation District

(47)C90-185

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

February 9, 1990

Mr. Dennis Hunt
Industrial Asphalt
P.O. Box 636
Pleasanton, CA 94566

Re: **Remedial investigation/action work plan for the Industrial Asphalt facility, Pleasanton**

Dear Mr. Hunt:

The Alameda County Department of Environmental Health, Hazardous Materials Division has reviewed the RI/RAP prepared by Kleinfelder, and has discussed the plan's implementation with Krys Jesionek. Generally, we concur with the work plan methodology and its assumptions regarding the baseline health risk assessment, and would like work to proceed as soon as possible.

Based on the availability problems for drilling rigs, it appears that the schedule in Sec. 8 of the work plan is optimistic; please send an updated schedule to this office, covering milestones through treatment system startup.

Monthly sampling and water level recording should continue, with the results incorporated into the monthly remedial progress reports. These monthly reports should also contain specific plans for the month ahead. The next report is due on March 9, 1990, and must be sent to this office as well as to the Regional Water Quality Control Board in Oakland. 15-20TH of each month

If you have any questions about this letter, please contact the undersigned at 271-4320.

Quarterly rpt. for 1ST Q 1990
due by end of April 1990

Sincerely,

Gilbert M. Wistar

Gil Wistar
Hazardous Materials Specialist

cc: Krys Jesionek, Kleinfelder
Lester Feldman, S.F. Bay RWQCB
Rafat A. Shahid, Asst. Agency Director, Environmental Health
files

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

November 13, 1989

Mr. Dennis Hunt
Industrial Asphalt
52 El Charro Rd.
Pleasanton, CA 94566

RE: **Review of work completed and additional work required regarding contamination at the Industrial Asphalt facility**

Dear Mr. Hunt:

The Alameda County Department of Environmental Health, Hazardous Materials Division, has reviewed the Industrial Asphalt file and consulted with the San Francisco Bay Regional Water Quality Control Board (RWQCB), in order to develop guidelines for further characterization and remediation at this site. As you know, the contamination discovered in early 1987 has been the subject of ongoing studies right up to the present. In our view, the time has come for Industrial Asphalt, as the responsible party, to pull all the pieces together, fill in data gaps, and develop a comprehensive remediation plan. The purpose of this letter, then, is to: 1) outline what this office knows about the site; 2) review theories that have been advanced to explain analytical results; and 3) define what further work is required at the site.

Before tank closure began, there were eight underground tanks at the site; six of these tanks have been removed (two containing diesel and four containing asphalt), and two asphalt tanks remain in the ground. Following the initial removals, seven soil borings were drilled to a depth of about 45 feet in the tank area. Soil sample results indicated diesel at up to 4,600 ppm. No other subsurface soil samples have been collected to date, except the ones collected during the installation of monitoring wells MW-9, MW-10, and MW-11. At these locations, samples were collected from 70, 75, and between 65-75 feet, respectively, and contamination ranged from ND to 120 ppm hydrocarbons.

There are 10 monitoring wells and one observation well at the facility, which were installed over three different time periods beginning in 1987. Monthly monitoring and water level readings have occurred up to the present. In MW-1, free-product thickness has ranged up to 3.2 feet (August 1987). In MW-2, 14 feet of free product was measured in August 1987, and there was still 5 feet of product in July 1988. MW-3 had 2.6 feet of product in March 1988, and 0.5 feet as of August 1988. These three wells, the first to be installed, are also the closest monitoring wells to the former tanks, and are relatively shallow. No free product has been found in wells MW-4, MW-5, MW-6, MW-7, MW-9, MW-10, or MW-11, although sheens have been recorded in wells MW-6, MW-7, MW-9, and MW-11.

Monitoring well MW-8 had a free product level of 2.4 feet in July 1988, and this decreased to 0.13 feet in December 1988. Overall, the level of free product has appeared to decline, as has the level of water in all wells, since the monitoring program began. Wells MW-1, MW-2, and MW-3 have been dry more often than not over the past nine months or so.

Kleinfelder, Inc. has advanced several theories regarding the disposition of contaminants in the subsurface environment. In the first place, they hypothesized that the very high levels of free product found in the initial year of monitoring resulted from the drilled boreholes acting as a conduit through which product could accumulate rapidly. By this theory, the total released volume of diesel or other contaminants would be much smaller than a free product thickness of 14 feet might indicate. Another theory is that contaminants have migrated relatively quickly through the porous soil profile and flattened out onto the water table, to the extent that little, if any, pockets of pure product remain. Finally, Kleinfelder has suggested that the contaminants are viscous enough to have hung up in the soil as the level of groundwater has dropped steadily. At this point, none of these theories has been proved, and the extent and location of the soil/groundwater plume remains sketchily defined, at best.

On the first page of its September 4, 1987 report, Kleinfelder states the following: "The contaminants of concern at this site have migrated to the ground water table and have contaminated groundwater. The lateral and vertical extent of the contaminant plume, which are as yet unknown, should be delineated in order to assess the impact on soil and groundwater resources. Remediation measures to clean up the contaminated soil and groundwater will be dependent on factors such as 1) concentration level of soil contamination, 2) concentration level of contamination of the groundwater, 3) spatial extent of the contaminant plume, and 4) beneficial uses of the groundwater." We, in consultation with the RWQCB, agree with this prescription, but two years later much of it remains undone.

Therefore, acting as the agent of the RWQCB, we are requiring the following work to be completed.

A. Further Plume and Hydrologic Characterization

1. What is (are) the contaminant(s) of concern at the site? Is it diesel, asphalt, a mixture, or other hydrocarbons? Define which contaminants are where in the subsurface environment so that a sensible remediation plan can be developed.

2. Soil between a depth of about 45 feet and the water table needs much better characterization in the area of the "inferred plume" (shown on Plate 26 of the September 10, 1989 report). We need far more information on the soil plume (if one exists) so that the "hang-up" theory can be tested.

3. Groundwater immediately beneath the area of the former tanks needs better characterization. Wells MW-1, MW-2, and MW-3 are too shallow to provide consistent information, given the fluctuating water table levels, and deeper wells are needed in this area.

4. What are beneficial uses of groundwater in the area? What effect could spreading contamination have on drinking water, industrial water supplies, or recreational uses of water? Is there a deeper, confined aquifer in the area that could be affected?

B. Remediation Plans

1. Hydrocarbon and PCB levels in soils must be reduced to a point that they will not further degrade groundwater quality in any way.

2. Hydrocarbon and PCB levels in groundwater must be reduced to "ND." An effectiveness evaluation of all components of the remediation operation will need to be performed. The purpose of the evaluation will be to show that the system is doing what it was intended to do; the evaluation at a minimum should indicate whether 1) the capture zone is in fact adequate to contain the plume; and 2) any free product levels, as well as dissolved hydrocarbons and PCBs, are declining in groundwater beneath the site.

3. Monthly groundwater sampling and water level monitoring should continue uninterrupted until remediation is complete; quarterly progress reports summarizing this groundwater data, as well as remedial operations to date, will need to be submitted to this office and to the RWQCB.

We are requesting that you address all of the issues raised in this letter and prepare a full report, which includes additional soil and groundwater characterization and specific remedial plans. This report must be submitted to this office and to the RWQCB (attn: Lester Feldman) no later than **January 31, 1990.**

The RWQCB is currently unable to manage the large number of fuel leak/remediation cases within Alameda County, and has therefore delegated this responsibility to our office. Because we are overseeing this site under the designated authority of the Water Board, this letter constitutes a formal request for technical reports, according to Sec. 13267(b) of the California Water Code. Failure to respond fully or in a timely manner to this request could result in civil liabilities under the Water Code of up to $1,000 per day. Other violations of California law may also be cited.

If you have any questions about this letter, please contact the undersigned at 271-4320.

Sincerely,

Gilbert M. Wistar

Gil Wistar
Hazardous Materials Specialist

cc: Krys Jesionek, Kleinfelder, Inc.
Lester Feldman, RWQCB
Rafat A. Shahid, Asst. Agency Director, Environmental Health
files

G.W.

STATE OF CALIFORNIA—HEALTH AND WELFARE AGENCY GEORGE DEUKMEJIAN, Governor

DEPARTMENT OF HEALTH SERVICES
714/744 P STREET
P.O. BOX 942732
SACRAMENTO, CA 94234-7320

(916) 324-1807

89 NOV 16 PM 12:54

November 13, 1989

Mr. Krzysztof S. Jesionek
Kleinfelder
212 N. California Blvd., Suite 570
Walnut Creek, CA 94596

Dear Mr. Jesionek:

This is in response to your October 9, 1989 letter asking for confirmation that monitoring well purge water containing less than 5 mg/l polychlorinated biphenyls (PCBs) can be used as process water at the same location in the manufacturing of asphalt. The monitoring wells and the asphalt processing plant are both located at Industrial Asphalt in Pleasanton, California.

Your letter indicated that Industrial Asphalt accumulates the monitoring well purge water in drums and has each drum tested for priority constituents. Analysis of the purge water is now showing concentrations of PCBs much less than our hazardous waste criteria found in Article 11, Chapter 30, Division 4, of the California Code of Regulations (CCR). Your letter also states that the Alameda County Hazardous Materials Program has approved the proposed introduction of the purge water in to the asphalt production process.

Since the Department would not regulate the purge water that contains PCBs at levels below our hazardous waste criteria, such waters could be used in the asphalt production process. You should also be aware that the federal standards under the Toxic Substances Control Act (TSCA) 40 CFR, Part 761 require that asphalt products contain less than detectable (less than 2 ppm) PCBs before the product leaves the asphalt facility.

November 13, 1989

If your have any questions concerning this letter please contact Leif Peterson at the letterhead address or telephone (916) 322-1005.

Sincerely,

Robert McCormick

Robert McCormick
Alternative Technology Division
Toxic Substances Control Program

cc: Mr. Gil Wistar
Alameda County Department of
Environmental Health
Hazardous Materials Program
80 Swan Way, Room 200
Oakland, CA 94621

Toxic Substances Control Program
Site Mitigation
Region 2
5850 Shellmound Blvd., Suite 390
Emeryville, CA 94608

RM:LP:db

ALAMEDA COUNTY
DEPT. OF ENVIRONMENTAL HEALTH
HAZARDOUS MATERIALS

10/19/89

KLEINFELDER

transmittal

Date 16 October 1989

File 10-1682-03

Copies 2

To Mr. Gil Wistar
Hazardous Materials Specialist
Hazardous Materials Program
Department of Environmental Health
80 Swan Way, Room 200
Oakland, CA 94621

Subject Disposal of Purge Water

We are sending ☑ Attached ☐ Under separate cover

The following: Copies of two letters for your files

Via:

- ☐ Messenger
- ☑ First Class Mail
- ☐ Air
- ☐ Express
- ☐ United Parcel
- ☐ Air Freight
- ☐ _____

Transmitted:

- ☐ As Requested
- ☐ For Approval
- ☑ For Your Use
- ☐ For Review & Comment

Remarks _____

By Kyp Jesional

KLEINFELDER 2121 N. California Blvd., Suite 570, Walnut Creek, CA 94596 (415) 938-5610

8/24/89

KLEINFELDER

August 18, 1989
File: 10-1682-03/32

Mr. Leif Peterson
Department of Health Services
Alternative Technology Section
Toxic Substances Control Division
714/744 "P" Street
P.O. Box 942732
Sacramento, CA 94234-7320

SUBJECT: Recycling for Disposal of Purge Water, Industrial Asphalt Facility, 52 El Charro Road, Pleasanton, California

Dear Mr. Peterson:

As discussed during our telephone conversation on August 17, 1989, this letter is to summarize available options regarding recycling for disposal of purge water at the subject site.

BACKGROUND

On behalf of our client, Kleinfelder, Inc., purged and sampled ten existing onsite ground water monitoring wells. Purge water is contained in 55-gallon drums and left onsite pending chemical laboratory results. Approximately 40 gallons of water is purged from each well prior to sampling. All water samples are tested for target compounds including total petroleum hydrocarbons as diesel (TPH-D) and polychlorinated biphenyls (PCBs). The most recent tests indicate relatively low concentrations of dissolved hydrocarbons in two monitoring wells (see attached table). Therefore, a total of approximately 80 gallons/month of purge water would have to be disposed of (recycled).

PREFERRED DISPOSAL METHOD

It is proposed that purge water containing dissolved diesel oil be utilized in the manufacture of asphalt at the facility. It would be added to sand which, before entering the process, is dried off (steamed off).

It is our understanding that this disposal option is in accordance with the California Hazardous Waste Control Act (California Health and Safety Code, Division 20, Chapter 6.5, Article 4, Section 25143.2 - b).

Please advise us whether this option for disposal of purge water is acceptable by the California State Department of Health Services. Thank you.

Sincerely,

KLEINFELDER, INC

Krzysztof (Krys) S. Jesionek
Project Geohydrologist

cc: Mr. Gil Wistar - Alameda County Office of Hazardous Materials

KSJ:jwh

KLEINFELDER 2121 N. California Blvd., Suite 570. Walnut Creek, CA 94596 (415) 938-5610

ALAMEDA COUNTY
HEALTH CARE SERVICES
AGENCY
DAVID J. KEARS, Agency Director

Certified mailer #P 833 981 422

DEPARTMENT OF ENVIRONMENTAL HEALTH
Hazardous Materials Program
80 Swan Way, Rm. 200
Oakland, CA 94621
(415)

May 22, 1989

Mr. Dennis Hunt
Industrial Asphalt
1645 Stanley Blvd.
P.O. Box 636
Pleasanton, CA 94566

Re: Free product and groundwater contamination at the Industrial Asphalt facility, 1645 Stanley Blvd., Pleasanton

Dear Mr. Hunt:

The Alameda County Department of Environmental Health, Hazardous Materials Division, has reviewed Kleinfelder's Project Status Report #4 on the above facility, dated April 19, 1989. This report indicates that levels of free product resulting from former underground storage tanks at the site have decreased significantly in all eight monitoring wells. Free product measured at up to 14 feet in August 1987 has most recently been measured at a maximum of 0.02 feet. The steady decrease of free product levels over the months, in combination with the relatively porous lithology of the vadose zone, suggest a "pancaking" of the product layer within the subsurface environment. In our opinion, free product is likely to have migrated laterally with groundwater movement, and we are therefore requesting that Industrial Asphalt define the extent of the plume and prepare a remediation plan as soon as possible.

In its April 1989 report, Kleinfelder advances the theory that free product has become trapped in the unsaturated zone above the current water table. Under this theory, as groundwater levels have decreased, free product has stuck to the soil. However, data does not seem to support this hypothesis. Over several monthly monitoring intervals in wells MW-1, MW-2, and MW-3, depths to groundwater have decreased (even though the overall trend is increasing depth to groundwater), yet free product thicknesses still decreased over these time intervals. Also, the coarse-grained nature of the soils below 23 feet is unlikely to restrict vertical movement of any but the most viscous materials. The two borings that Kleinfelder is planning to install on either side of the tank pit area should in any case show how much contamination is actually stuck in the unsaturated zone.

The large volume of diesel that was apparently released from the underground tanks at the site suggests that the contaminant plume may now cover a wide area, and may be moving relatively quickly through the porous subsurface. Unfortunately, the groundwater flow regime

appears to depend more on random local well pumping than on regional gradients, a factor likely to complicate plume boundary definition. Nonetheless, after consultation with the Regional Water Quality Control Board, San Francisco Bay Region, we are requiring that you take measures, without delay, to define and mitigate the free product plume.

The plume of groundwater containing dissolved hydrocarbons should also be characterized, since soluble portions of free product have mixed with groundwater. Monthly sampling of groundwater should continue, and analytical parameters for samples from all monitoring should be expanded to include TPH-diesel and BTEX.

We are requesting that you submit a workplan to address these groundwater issues by **June 23, 1989**. The plume characterization plan should be designed in such a way that it anticipates the subsequent groundwater remediation program. The workplan should also incorporate the results of the two soil borings to be completed in the next week or so, as well as present conclusions and plans for soil remediation, if appropriate.

Please submit to this office as soon as possible a deposit of $800, made out to Alameda County, for our remediation oversight. Authorized by Section 3-141.6 of Alameda County's Ordinance Code, this deposit will be charged at an hourly rate whenever the Hazardous Materials Specialist assigned to the project spends time discussing the case, reviewing plans, etc.

In addition, the Hazardous Materials Division does not have complete records of Industrial Asphalt's Business Plan. According to state law, this plan needs to include both a detailed contingency plan for chemical emergencies and an inventory of hazardous materials and wastes stored, used, and disposed of by a facility. We are requesting that you provide inventory data on the enclosed forms by June 23, 1989. If you have any questions about this letter, please contact Gil Wistar, Hazardous Materials Specialist, at 271-4320.

Sincerely,

Rafat A. Shahid

Rafat A. Shahid, Chief
Hazardous Materials Division

RAS/GMW - enclosure

cc: Krys Jesionek, Kleinfelder (w/o enclosure)
Dyan Whyte, RWQCB (w/o enclosure)
Howard Hatayama, DOHS (w/o enclosure)

P 833 981 422

RECEIPT FOR CERTIFIED MAIL

NO INSURANCE COVERAGE PROVIDED
NOT FOR INTERNATIONAL MAIL

(See Reverse)

Sent to	
Street and No. 1645 Stanley Blvd.	
P.O., State and ZIP Code Pleasanton	
Postage	$
Certified Fee	
Special Delivery Fee	
Restricted Delivery Fee	
Return Receipt showing to whom and Date Delivered	
Return Receipt showing to whom, Date, and Address of Delivery	
TOTAL Postage and Fees	$
Postmark or Date	

PS Form 3800, June 1985

SENDER: Complete items 1 and 2 when additional services are desired, and complete items 3 and 4.

Put your address in the "RETURN TO" Space on the reverse side. Failure to do this will prevent this card from being returned to you. The return receipt fee will provide you the name of the person delivered to and the date of delivery. For additional fees the following services are available. Consult postmaster for fees and check box(es) for additional service(s) requested.

1. ☐ Show to whom delivered, date, and addressee's address. *†(Extra charge)†*
2. ☐ Restricted Delivery *†(Extra charge)†*

3. Article Addressed to:

Mr. Dennis Hunt
Industrial Asphalt
1645 Stanley Blvd.
P.O. Box 636
Pleasanton, CA 94566

4. Article Number
P833 981 422

Type of Service:
☐ Registered ☐ Insured
☑ Certified ☐ COD
☐ Express Mail

Always obtain signature of addressee or agent and DATE DELIVERED.

5. Signature – Addressee
X

6. Signature – Agent
X

7. Date of Delivery 5/25/89

8. Addressee's Address *(ONLY if requested and fee paid)*

PS Form 3811, Mar. 1987 * U.S.G.P.O. 1987-178-288 DOMESTIC RETURN RECEIPT

Steam Pgl
File

KLEINFELDER

January 5, 1988
File: 10-1682-03

Mr. Greg Zentner
California Regional Water Quality Control Board
San Francisco Bay Region
1111 Jackson Street, Room 6040
Oakland, California 94607

SUBJECT: Recycling for Disposal of Hazardous Waste, Industrial Asphalt Facility, Pleasanton, California

Dear Mr. Zentner:

Kleinfelder is pleased to prepare this letter regarding recycling for disposal of hazardous waste at the Industrial Asphalt facility in Pleasanton, California.

In accordance with our letter to the California Regional Water Quality Control Board, dated December 2, 1987, we directed our client, Industrial Asphalt, to recycle the temporarily stockpiled backfill excavated during underground tank removal on September 20, 1987. In accordance with California Administrative Code, Titles 22 and 23, the contaminated backfill material was recycled onsite through the asphalt and batch plants at the Industrial Asphalt Facility.

Should you have any questions, please contact us.

Sincerely,

KLEINFELDER

Elaine J. Hanford, R.G.
Senior Project Manager

(for) Thomas E. Bailey, P.E.
Vice President/Engineering Manager

RECEIVED
JAN 6 1988
HAZARDOUS MATERIALS/WASTE MANAGEMENT

EJH:TEB:wh

cc: Mr. Dwight Beavers, Industrial Asphalt
Mr. Dennis Hunt, Industrial Asphalt
Mr. Rafat Shahid, Alameda County Department Environmental Health
Mr. Richard Mueller, Pleasanton Fire Department
Mr. Kenneth Theisen, CRWQCB
Mr. Howard Hatayama, Department of Health Services

(4)C88-012

UNDERGROUND STORAGE TANK UNAUTHORIZED RELEASE (LEAK) / CONTAMINATION SITE REPORT

EMERGENCY ☐ YES ☒ NO

HAS STATE OFFICE OF EMERGENCY SERVICES REPORT BEEN FILED ? ☐ YES ☒ NO

REPORT DATE 1 M 2 M 0 D 7 D 8 Y 7 Y

CASE #

FOR LOCAL AGENCY USE ONLY
I HEREBY CERTIFY THAT I AM A DESIGNATED GOVERNMENT EMPLOYEE AND THAT I HAVE REPORTED THIS INFORMATION TO LOCAL OFFICIALS PURSUANT TO SECTION 25180.7 OF THE HEALTH AND SAFETY CODE.
SIGNED Steven Ellman DATE 1/21/88

REPORTED BY

NAME OF INDIVIDUAL FILING REPORT | PHONE ( ) | SIGNATURE

REPRESENTING ☐ OWNER/OPERATOR ☒ REGIONAL BOARD ☐ LOCAL AGENCY ☐ OTHER _____ | COMPANY OR AGENCY NAME

ADDRESS — STREET — CITY — STATE — ZIP

RESPONSIBLE PARTY

NAME Industrial Asphalt ☐ UNKNOWN | CONTACT PERSON | PHONE ( )

ADDRESS 1645 STANLEY STREET | CITY PLEASANTON | STATE | ZIP

SITE LOCATION

FACILITY NAME (IF APPLICABLE) Industrial Asphalt | OPERATOR | PHONE ( )

ADDRESS 1645 STREET STANLEY CITY PLEASANTON COUNTY ZIP

CROSS STREET

TYPE OF AREA ☐ COMMERCIAL ☐ INDUSTRIAL ☐ RURAL ☐ RESIDENTIAL ☒ OTHER gravel pits

TYPE OF BUSINESS ☐ RETAIL FUEL STATION ☐ FARM ☒ OTHER rock & gravel

IMPLEMENTING AGENCIES

LOCAL AGENCY — AGENCY NAME: Alameda County Health Dept | CONTACT PERSON: S Gorman | PHONE (415) 834-7237

REGIONAL BOARD | PHONE ( )

SUBSTANCES INVOLVED

(1) NAME: Diesel | QUANTITY LOST (GALLONS) _____ ☐ UNKNOWN

(2) PCB _____ ☐ UNKNOWN

DISCOVERY/ABATEMENT

DATE DISCOVERED M M D D Y Y | HOW DISCOVERED ☐ TANK TEST ☐ INVENTORY CONTROL ☐ TANK REMOVAL ☐ SUBSURFACE MONITORING ☐ OTHER ☐ NUISANCE CONDITIONS

DATE DISCHARGE BEGAN M M D D Y Y ☐ UNKNOWN

HAS DISCHARGE BEEN STOPPED ? ☐ YES ☐ NO IF YES, DATE M M D D Y Y

METHOD USED TO STOP DISCHARGE (CHECK ALL THAT APPLY)
☐ REMOVE CONTENTS ☐ REPLACE TANK ☐ CLOSE TANK
☐ REPAIR TANK ☐ REPAIR PIPING ☐ CHANGE PROCEDURE
☐ OTHER _____

SOURCE/CAUSE

SOURCE OF DISCHARGE
☒ TANK LEAK ☐ UNKNOWN
☐ PIPING LEAK
☐ OTHER

TANKS ONLY/CAPACITY
_____ GAL.
AGE _____ YRS
☐ UNKNOWN

MATERIAL
☐ FIBERGLASS
☐ STEEL
☐ OTHER _____

CAUSE(S)
☐ OVERFILL ☐ RUPTURE/FAILURE
☐ CORROSION ☐ UNKNOWN
☐ SPILL ☐ OTHER _____

CASE TYPE

CHECK ONE ONLY
☐ UNDETERMINED ☐ SOIL ONLY ☒ GROUNDWATER ☐ DRINKING WATER - (CHECK ONLY IF WATER WELLS HAVE ACTUALLY BEEN AFFECTED)

CURRENT STATUS

CHECK ONE ONLY
☒ SITE INVESTIGATION IN PROGRESS (DEFINING EXTENT OF PROBLEM) ☐ CLEANUP IN PROGRESS ☐ SIGNED OFF (CLEANUP COMPLETED OR UNNECESSARY)
☐ NO ACTION TAKEN ☐ POST CLEANUP MONITORING IN PROGRESS ☐ NO FUNDS AVAILABLE TO PROCEED ☐ EVALUATING CLEANUP ALTERNATIVES

REMEDIAL ACTION

CHECK APPROPRIATE ACTION(S) (SEE BACK FOR DETAILS)
☐ CAP SITE (CD) ☐ EXCAVATE & DISPOSE (ED) ☐ REMOVE FREE PRODUCT (FP) ☐ ENHANCED BIO DEGRADATION (IT)
☐ CONTAINMENT BARRIER (CB) ☐ EXCAVATE & TREAT (ET) ☐ PUMP & TREAT GROUNDWATER (GT) ☐ REPLACE SUPPLY (RS)
☐ TREATMENT AT HOOKUP (HU) ☐ NO ACTION REQUIRED (NA) ☐ OTHER (OT) _____

COMMENTS

Reported by Kleinfelder & Assoc, 1901 Olympic Blvd #300 Walnut Creek to RWQCB. RWQCB → ACHD.
GW: TPH = 350 mg/l
PCB = 18 mg/l

HSC 05 (4/87)

INSTRUCTIONS

EMERGENCY
Indicate whether emergency response personnel and equipment were involved at any time. If so, a Hazardous Material Incident Report should be filed with the State Office of Emergency Services (OES) at 2800 Meadowview Road, Sacramento, CA 95832. Copies of the OES report form may be obtained at your local underground storage tank permitting agency. Indicate whether the OES report has been filed as of the date of this report.

LOCAL AGENCY ONLY
To avoid duplicate notification pursuant to Health and Safety Code Section 25180.7, a designated government employee should sign and date the form in this block. A signature here does not mean that the leak has been determined to pose a significant threat to human health or safety, only that notification procedures have been followed if required.

REPORTED BY
Enter your name, telephone number, and address. Indicate which party you represent and provide company or agency name.

RESPONSIBLE PARTY
Enter name, telephone number, contact person, and address of the party responsible for the leak. The responsible party would normally be the tank owner.

SITE LOCATION
Enter information regarding the tank facility and surrounding area. At a minimum, you must provide the facility name and full address.

IMPLEMENTING AGENCIES
Enter names of the local agency and Regional Water Quality Control Board involved.

SUBSTANCES INVOLVED
Enter the name and quantity lost of the hazardous substance involved. Room is provided for information on two substances if appropriate. If more than two substances leaked, list the two of most concern for cleanup.

DISCOVERY/ABATEMENT
Provide information regarding the discovery and abatement of the leak.

SOURCE/CAUSE
Indicate source(s) of leak. Provide details on tank age; capacity and material if known. Check box(es) indicating cause of leak.

CASE TYPE
Indicate the case type category for this leak. Check one box only. Case type is based on the most sensitive resource affected. For example, if both soil and ground water have been affected, case type will be "Ground Water". Indicate "Drinking Water" only if one or more municipal or domestic water wells have actually been affected. A "Ground Water" designation does not imply that the affected water cannot be, or is not, used for drinking water, but only that water wells have not yet been affected. It is understood that case type may change upon further investigation.

CURRENT STATUS
Indicate the category which best describes the current status of the case. Check one box only. The response should be relative to the case type. For example, if case type is "Ground Water", then "Current Status" should refer to the status of the ground water investigation or cleanup, as opposed to that of soil.

IMPORTANT: THE INFORMATION PROVIDED ON THIS FORM IS INTENDED FOR GENERAL STATISTICAL PURPOSES ONLY AND IS NOT TO BE CONSTRUED AS REPRESENTING THE OFFICIAL POSITION OF ANY GOVERNMENTAL AGENCY

REMEDIAL ACTION
Indicate which actions have been used to cleanup or remediate the leak. Descriptions of options follow:

Cap Site - install horizontal impermeable layer to reduce rainfall infiltration.
Containment Barrier - install vertical dike to block horizontal movement of contaminant.
Excavate and Dispose - remove contaminated soil and dispose in approved site.
Excavate and Treat - remove contaminated soil and treat (includes spreading or land farming).
Remove Free Product - remove floating product from water table.
Pump and Treat Groundwater - generally employed to remove dissolved contaminants.
Enhanced Biodegradation - use of any available technology to promote bacterial decomposition of contaminants.
Replace Supply - provide alternative water supply to affected parties.
Treatment at Hookup - install water treatment devices at each dwelling or other place of use.
No Action Required - incident is minor, requiring no remedial action.

COMMENTS - Use this space to elaborate on any aspects of the incident.
SIGNATURE - Sign the form in the space provided.
DISTRIBUTION

If the form is completed by the tank owner or his agent, retain the last copy and forward the remaining copies in tact to your local tank permitting agency for distribution.

1. Original - Local Tank Permitting Agency
2. State Water Resources Control Board, Division of Water Quality, Underground Tank Program, P. O. Box 100, Sacramento, CA 95801
3. Regional Water Quality Control Board
4. County Board of Supervisors or designee to receive Proposition 65 notifications.
5. Owner/responsible party.

NOTIFICATION OF HAZARDOUS WASTE DISCHARGE 2870361

1.DATE OF REPORT: 12/7/87 2.STAFF FILING REPORT: LF 3.WB FILE NO. 2198.18

4.SOURCE OF INFORMATION: NAME: Kleinfelder + Assoc.
ADDRESS: 1901 Olympic Blvd, Suite 300
CITY: Walnut Creek
STATE: CA PHONE: (415) ___-____

5.TYPE OF INFORMATION: Letter Report 6.TYPE OF DISCHARGE Tank Release
7.DATE OF INITIAL DISCHARGE: UNK

8.LOCATION OF DISCHARGE: SITE NAME: Industrial Asphalt
ADDRESS: 1645 Stanley Blvd
CITY: Pleasanton COUNTY: Alameda
PHONE AT SITE: (___) ___-____

9.PERSON/COMPANY RESPONSIBLE: NAME: Industrial Asphalt
ADDRESS: 1645 Stanley Blvd
CITY: Pleasanton STATE: CA
PHONE: (___) ___-____

10.CHEMICALS-KNOWN/SUSPECTED HAZARDOUS(K/S): K (IF KNOWN, FILL IN CHEMICAL
11.ESTIMATED TOTAL VOLUME: UNK UNITS: mg/l DATA BELOW)

12.DESCRIBE INCIDENT: tank release to soil and groundwater

13.DATE DESIGNATED EMPLOYEE DETERMINED DISCHARGE ILLEGAL: 12/7/87 TIME: 1630

14.FOLLOW-UP NOTIFICATION? (Y/N)_____

15.HEALTH AGENCY CONTACTED: DATE:_____ TIME:____ METHOD OF CONTACT:_____
PERSON CONTACTED:_____
PHONE: (___) ___-____

16.SUPERVISORS CONTACTED: DATE:_____ TIME:_____ METHOD OF CONTACT:_____
PERSON CONTACTED:_____
PHONE: (___) ___-____

17.WRITTEN NOTIFICATION: 12-8-87
HEALTH DEPARTMENT: CONTACT: c/o Environmental Health Director
DATE:MMDDYY AGENCY:_____
ADDRESS:_____
PHONE: (___) ___-____ CITY:_____
USPS REG. NO.:_____
BOARD OF SUPERVISORS: CONTACT: c/o Environmental Health Director
DATE:MMDDYY AGENCY:_____
ADDRESS:_____
PHONE: (___) ___-____ CITY:_____
USPS REG. NO:_____

18.STATE AGENCY CONTACT: Lester Feldman
EXISTING FILE NO: UNASSIGNED TOXICS PHONE: (415) 464-1332

19.FOLLOW-UP ACTION: UNASSIGNED TOXICS

TO THE BEST OF MY KNOWLEDGE, I CERTIFY THE ABOVE STATEMENTS TO BE TRUE AND CORRECT.

Lester Feldman (415) 464-1332

20.DESIGNATED EMPLOYEE PHONE NO. 21.DATE: 12/7/87 TIME: 1630

Rec'd 12/8/87 [illegible]

NOTIFICATION OF HAZARDOUS WASTE DISCHARGE
TABLE OF DISCHARGED CHEMICALS

DATE: 12/7/87 REPORT NO: 870361

LOCATION OF DISCHARGE: SITE NAME: Industrial Asphalt
ADDRESS: 1645 Stanley Blvd.
CITY: Pleasanton / COUNTY: Alameda

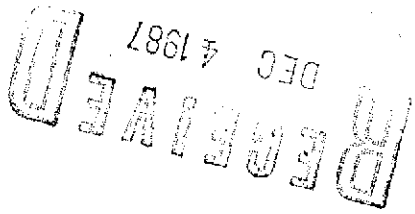
CHEMICAL	VOLUME	CHEMICAL SUSPECTED/CONFIRMED	MAXIMUM CONCENTRATION	DATE
Diesel	UNK	CONFIRMED	350 mg/l GW	7/30/87
PCB AR1260	UNK	CONFIRMED	~~500 ppb soil~~ 18. mg/l GW	~~8/12/87~~ 9/2/87

NOTIFICATION OF HAZARDOUS WASTE DISCHARGE

Storm file

KLEINFELDER

December 2, 1987
File: 10-1682-03



Mr. Greg Zentner
California Regional Water Quality Control Board
San Francisco Bay Region
1111 Jackson Street, Room 6040
Oakland, California 94607

SUBJECT: Recycling for Disposal of Hazardous Waste
Industrial Asphalt Facility, Pleasanton, California

Dear Mr. Zentner:

Kleinfelder is pleased to prepare this letter regarding recycling for disposal of hazardous waste at the Industrial Asphalt facility in Pleasanton, California.

This letter is prepared in accordance with the following:

- Phone conversation with Mr. Kenneth Theisen, California Regional Water Quality Control Board (CRWQCB), on October 22, 1987
- Phone conversation with Mr. Howard Hatayama, Department of Health Services (DHS), on November 12, 1987
- Phone conversations with yourself (Mr. Greg Zentner), on October 20 and November 24, 1987
- Title 22, Division 4, Chapter 30, Article 12, Section 66796(3), regarding recyclable hazardous waste types, including used or unused petroleum products
- Title 23, Chapter 3, Subchapter 15, Article 2511 (h), regarding exemptions for recycling

BACKGROUND

In accordance with recommendations presented in our "Project Status Report: Environmental Engineering Services, Industrial Asphalt Facility, Pleasanton, California," dated September 4, 1987, and in accordance with "Guidelines for Addressing Fuel Leaks" issued by the California Regional Water Quality Control Board, San Francisco Bay Region, Kleinfelder directed removal of the remaining four asphalt tanks at the Industrial Asphalt Facility on September 20, 1987. Excavated backfill was temporarily stockpiled and contained onsite. Twelve closure samples were collected in the excavation. In addition, four samples of the stockpiled backfill were taken and composited on an equal weight basis.

(4)C87215

The samples were submitted to Anatec Laboratories, Inc., for analysis of total petroleum hydrocarbons as diesel using EPA Method 8015 and for polychlorinated biphenyls (PCB's) using EPA Method 8080. Copies of the laboratory reports and chain-of-custody forms are appended.

PREFERRED DISPOSAL METHOD

In accordance with California Administrative Code, Titles 22 and 23 as referenced above, and in accordance with the verbal concurrence received from representatives of the CRWQCB and DHS in telephone conversations referenced above, the preferred method for disposal of the hydrocarbon contaminated backfill is by onsite recycling through the asphalt plant at the Industrial Asphalt Facility. We will direct our client, Industrial Asphalt, immediately to proceed with recycling of the stockpile material.

Should you have any questions, please contact us.

Yours very truly,

KLEINFELDER

Elaine J. Hanford, R.G.
Project Manager

Thomas E. Bailey
Vice President/Engineering Manager

cc: Mr. Dwight Beavers, Industrial Asphalt
Mr. Dennis Hunt, Industrial Asphalt
Mr. Rafat Shahid, Alameda County Department Environmental Health
Mr. Richard Mueller, Pleasanton Fire Department
Mr. Kenneth Theisen, CRWQCB
Mr. Howard Hatayama, Department, Health Services

EJH:TEB:cd

(4)C87215

ANATEC LABORATORIES INC.

435 Tesconi Circle
Santa Rosa, CA 95401
707-526-7200
Fax 707-526-9623

Stephen E. Fox
JH Kleinfelder & Associates
1901 Olympic Blvd., Ste 300
Walnut Creek, CA 94596

October 21, 1987
ANATEC Log No: **1257B** (1-16)
Series No: 300/013B
Client Ref: Job #10-1682-02

Subject: Analysis of 13 Soil Samples Identified as "Rhoades and Jameson Gravel Pit," Pleasanton, CA Received September 21, 1987.

Dear Mr. Fox:

Analysis of the samples referenced above has been completed. This report is written in confirmation of results telefaxed to you on October 15, 1987.

Samples were received under documented chain-of-custody. On receipt, sample custody was transferred to an ANATEC field chemist, who immediately placed them in refrigerated storage for transport to the laboratory.

On receipt at the laboratory, sample custody was transferred to ANATEC sample control personnel who subsequently documented receipt and condition of the samples and placed them in secured storage at 4 ^{o}C until analysis commenced.

Samples were prepared for extractable hydrocarbons measurements by thorough mixing and subsequent extraction with methylene chloride; extraction, aided by sonication, was performed three successive times for each sample. Extracts were then combined, dried over sodium sulfate and concentrated in Kuderna-Danish apparatus. Extracts were analyzed by capillary-column gas chromatography with flame ionization detection. Preparation and analysis of samples was accompanied by similar treatment of a sample replicate, method blank and a diesel-fortified sample. Response of the chromatographic system to calibration standards prepared with diesel fuel was compared with system response to samples for purposes of qualitative and quantitative interpretation.

Details of the analytical methodology are consistent with requirements specified in Method "II" ("Total Fuel Hydrocarbons, Medium-to-High Boiling Point Hydrocarbons,") in "Guidelines for Addressing Fuel Leaks," Regional Water Quality Control Board, San Francisco Bay Region, revised 1986; the preparation procedure used is described in detail in "Sonication Extraction," Method 3550 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," U.S. EPA, SW-846, 2nd edition, revised 1984.

In preparation for polychlorinated biphenyls (PCBs) measurements, a portion of each sample was extracted three successive times with methylene chloride and ultrasonic agitation. The extracts were combined and reduced in volume by evaporation of solvent. Extracts were then passed through a column of partially-deactivated Florisil to remove method interferences and subsequently analyzed by gas chromatography with electron-capture detection in accord with Method 8080, U.S. EPA SW-846, 3rd edition, revised 1986. Qualitative and quantitative interpretation of sample chromatograms were based on analyses of analytical-grade standards.

Analysis of samples was accompanied by various quality control procedures. These included preparation and analysis of method blanks and standards, and replicate and analyte-fortified ("spiked") sample portions. Results of quality control procedures are available on request but are not included in this report.

Analytical results are presented in Table 1. Please feel welcome to contact us should you have questions regarding procedures or results.

Submitted by:

John Hembrow-Beach
Project Chemist

Approved by:

William G. Kotz
Project Manager

/hs

TABLE 1. ANALYTICAL RESULTS FOR 13 SOIL SAMPLES IDENTIFIED AS "RHOADES AND JAMESON GRAVEL PIT, PLEASANTON, CA" RECEIVED SEPTEMBER 21, 1987

ANATEC Lab No.	Sample I.D.			Results (mg/Kg)[a] Extractable Petroleum Hydrocarbons, as Diesel	Results (mg/Kg)[a] Polychlorinated biphenyls
1257-1	S-1B	9/20/87	SF	29,000	0.51[b]
1257-2	S-2B	9/20/87	SF	2,000	<0.1
1257-3	S-3B	9/20/87	SF	26	<0.1
1257-4	S-4B	9/20/87	SF	1,500	<0.1
1257-5	S-5B	9/20/87	SF	<10	<0.1
1257-6	S-6B	9/20/87	SF	2,300	<0.1
1257-7	S-7B	9/20/87	SF	<10	<0.1
1257-8	S-8B	9/20/87	SF	150,000	<0.1
1257-9	S-9A	9/20/87	SF	<10	<0.1
1257-10	S-10B	9/20/87	SF	<10	<0.1
1257-11	S-11B	9/20/87	SF	<10	<0.1
1257-12	S-12B	9/20/87	SF	<10	<0.1
1257-13[c]	S-13A	9/20/87	SF	9,000	<0.1

[a]mg/Kg--Data are expressed as milligrams analyte per kilogram sample, as-received basis.
[b]Quantitated as Aroclor 1260.
[c]This sample was a composite of 4 samples: "S-13A, S-13B, S-13C, S-13D."

ALAMEDA COUNTY HEALTH CARE SERVICES AGENCY

MEMORANDUM

DATE : 10-15-87

TO : Lowell Miller

FROM : Liz Rose

SUBJECT: Industrial Asphalt
1645 Stanley Blvd
Pleasanton 94566

Elaine Hanford of Kleinfelder 938-5610 called regarding cleanup levels for PCB in groundwater at this site. I told her that she should check w/ the RWQCB.

She also informed me that an initial report was regarding this site was sent to your attention

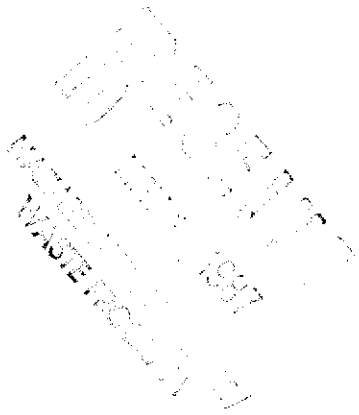
J. H. KLEINFELDER & ASSOCIATES

GEOTECHNICAL & ENVIRONMENTAL CONSULTANTS • MATERIALS TESTING
LAND & WATER RESOURCES

1901 OLYMPIC BOULEVARD, SUITE 300
WALNUT CREEK, CA 94596-5063

(415) 938-5610

May 18, 1987
File: 10-1682-01



Mr. Dwight Beavers
Vice President/Technical
Industrial Asphalt
6623 Calle Eva Miranda
Irwindale, CA 91706

SUBJECT: Final Environmental Investigation Report
Industrial Asphalt Facility
Eastern Alameda County, California

Dear Mr. Beavers:

We are pleased to submit this Final Environmental Investigation Report for your Industrial Asphalt facility in Eastern Alameda County, California. The enclosed report provides a description of the investigation performed, results of analytical testing, and recommendations for additional work needed to comply with state and local agency requirements. A work plan addressing the additional work will be submitted later this week.

We appreciate the opportunity to work with you on this project and trust this report meets your needs at the present time. If you have any questions, please feel free to contact us.

Very truly yours,

J. H. KLEINFELDER & ASSOCIATES

Kent R. Reynolds
Staff Geologist

R. Jeffrey Dunn, Ph.D., P.E.
Assistant Engineering Manager

KRR:RJD:tms

cc: Dennis Hunt, Industrial Asphalt, Pleasanton
Peter Johnson, RWQCB, San Francisco Bay Region
Lowell Miller, Alameda County Health

Krzysztof (Krys) S. Jesionek
Manager, Solid Waste Group

KLEINFELDER
2121 N. California Blvd., Suite 570
Walnut Creek, CA 94596
(415) 938-5610
(415) 938-5600 EXT 227
(415) 938-5419 FAX

DENNIS B. HUNT
District Manager

INDUSTRIAL ASPHALT

52 El Charro Rd.
P.O. Box 636
Pleasanton, CA 94566
(510) 846-5125
Mobil (510) 409-1836
FAX (510) 846-3928

State of California
California Regional Water Quality
Control Board
San Francisco Bay Region
2101 Webster Street, Suite 500
Oakland, CA 94612

Linda Spencer (415) 464-1199
Associate Engineering Geologist FAX 464-1380

DWIGHT BEAVERS
Vice President Technical

INDUSTRIAL ASPHALT

MAIL: P.O. Box 7607
Van Nuys, CA 91409

3200 San Fernando Rd.
Los Angeles, CA 90065
(818) 781-6080
FAX (213) 254-1191

ALAMEDA COUNTY HEALTH AGENCY
CARE SERVICES

Ravi Arulanantham, Ph.D.
Hazardous Materials Specialist

DIVISION OF HAZARDOUS MATERIALS
DEPARTMENT OF ENVIRONMENTAL HEALTH
80 Swan Way, Rm. 200, Oakland, CA 94621 • (415) 271-4320

JACK L. JAMES
Area Manager

INDUSTRIAL ASPHALT

5740 Windmill Way, Suite 11
Carmichael, CA 95608
(916) 485-6557
(916) 747-6654

Robert A. Lindfors
Environmental Engineer

KLEINFELDER
2121 N. California Blvd., Suite 570
Walnut Creek, CA 94596
(415) 938-5610
(415) 938-5419 (FAX)

William Marlin
Senior Regulatory Consultant

KLEINFELDER
3077 Fite Circle
Sacramento, CA 95827
(916) 366-1701
(916) 366-7013 FAX

David K. Behrens, PE
Environmental Engineering Manager

KLEINFELDER
2121 N. California Blvd., Suite 570
Walnut Creek, CA 94596
(510) 938-5600 Ext. 224
(510) 938-5610
(510) 938-5419 FAX

Barbara R. Bradley
Civil Engineer

KLEINFELDER
2121 N. California Blvd., Suite 570
Walnut Creek, CA 94596
(415) 938-5610
(415) 938-5600 EXT 419
(415) 938-5419 FAX

DWIGHT BEAVERS
Vice President Technical

INDUSTRIAL ASPHALT

MAIL: P.O. Box 7607
Van Nuys, CA 91409

3200 San Fernando Rd.
Los Angeles, CA 90065
(818) 781-6080
FAX (213) 254-1191